

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

DARIAN WOODBRIGHT, ET AL.,
on behalf of themselves and others
similarly situated,

Plaintiffs,

V.

HEALTH MATCHING
ACCOUNT SERVICES, INC.,

Defendant.

NO: 4:24-cv-04611

Judge Ellison

JURY TRIAL DEMANDED

EXHIBIT “B”

From: Alexander Loftus <alex@loftusandeisenberg.com>
Date: Friday, March 21, 2025 at 11:42 AM
To: Philip Burghardt <pburghardt@ClaimChoice.com>
Cc: Dennis Duffy <DDuffy@krcl.com>, AJ Johnson <ajohnson@krcl.com>
Subject: Subpoena Response

Phil,

I served you with the subpoena on 3/13. I'm disappointed I have not heard from you or your counsel yet.

Counsel from Claims Choice is cc'd here. We have a myriad of disputes about this, but the core issue is production of claims files which I agree with Mr. Duffy is a pandoras box of issues with HIPPA and such.

Rather than make work of Mr. Duffy having to jump on a motion to quash he and I agreed to press pause and in turn tell you to press pause on production while we work on ways to narrow this.

Please, please, have counsel contact me. This will be much easier to resolve with you or your attorney involved rather than in the abstract.

Thanks,

Alex

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